

1 District Judge Jamal N. Whitehead  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 CONSTANTINA DELGADO CRUZ.,  
10  
11 Petitioner,

v.  
12 TROY A. MILLER, *et al.*,  
13

Federal Respondents.

Case No. 2:24-cv-01502-JNW

STIPULATED MOTION AND TRO  
BRIEFING SCHEDULE

Noted for Consideration:  
September 20, 2024

Petitioner and Federal Respondents<sup>1</sup> submit this proposed briefing schedule. Petitioner filed a habeas petition and a motion for a temporary restraining order (“TRO”) earlier today. Dkt. Nos. 1 & 2. Petitioner is a civil detainee at the Northwest ICE Processing Center in Tacoma, Washington. The TRO motion asks this Court to order her to be released from immigration detention. TRO, at 13. Pursuant to Local Civil Rule 65(b), Federal Respondents must file a response within 48 hours after the motion is served. There is good cause for this Court to enter an alternative briefing schedule.

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1 Okanogan Sheriff Paul Budrow is not a federal respondent.

1       The parties have conferred and have agreed to and propose the following response  
 2 schedule to allow for both a response to the TRO motion and a reply:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Response to the TRO Motion	September 24, 2024
Petitioner's reply in support of the TRO Motion	September 26, 2024

7       This briefing schedule will result in the Court having a more complete record on which to  
 8 decide the TRO motion. This short extension of the response deadline will allow Federal  
 9 Respondents' time to obtain information necessary to respond to the TRO motion. Furthermore,  
 10 this schedule will allow Petitioner to reply to Federal Respondents' filing. Petitioner's removal  
 11 from the country is not imminent. Federal Respondents will advise the Court if this changes and  
 12 Petitioner's removal is scheduled prior to the issuance of a decision on the TRO Motion.

13       Accordingly, the parties request that the Court enter the proposed briefing schedule.

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24       DATED this 20th day of September, 2024.

STIPULATED MOTION FOR TRO BRIEFING SCHEDULE  
 [Case No. 2:24-cv-01502-JNW] - 2

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1 Respectfully submitted,

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11 *Attorneys for Federal Respondents*

12 ***I certify that this memorandum contains 253  
words, in compliance with the Local Civil  
Rules.***

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*Attorney for Petitioner*

## ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall submit briefing pursuant to the following schedule:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Response to the TRO Motion	September 24, 2024
Petitioner's reply in support of the TRO Motion	September 26, 2024

DATED this 20th day of September, 2024

Jamal W  
Jamal N. Whitehead  
United States District Judge